

STATEMENT OF JUSTIFICATION

Washington DC SMSA d/b/a Verizon Wireless Application for Commission Permit,
Special Exception and Zoning Modification to Co-locate a Telecommunication Facility
on an Existing Water Tank
At 17144 Evening Star Drive, Tax Map /34//30///1-A/, Loudoun County, Virginia

Washington DC SMSA d/b/a Verizon Wireless ("Verizon") has applied for a Special Exception ("SPEX") and Zoning Modification ("ZMOD") to permit telecommunication antenna to be placed on an existing non-conforming Water Tank with an unmanned equipment building at the base of the Water Tank for use as a telecommunication facility at 17144 Evening Star Drive (LCTM # /34//30///1-A/, MCPI # 554-26-6077). Verizon also requests a Commission Permit ("CMPT") confirming that this proposal is substantially in accord with the location, character and extent requirements of the Comprehensive Plan of Loudoun County ("Comprehensive Plan").

Location

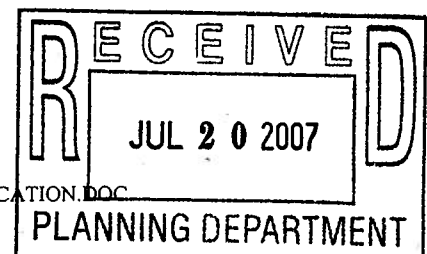
The site is north of the intersection of Harry Byrd Hwy (Route 7) and Evening Star Drive and is located adjacent to the Round Hill Elementary School. The subject property is located within the PDH-3 District (Planned Development – Housing), which is administered as the PDH-24 District (Planned Development – Housing) under the 1972 Loudoun County Zoning Ordinance. The existing 145 ft Water Tank is owned by the Town of Round Hill and is currently void of any telecommunication antenna(s). Subsequent to construction of the Water Tank, a subdivision waiver was approved that permitted the Water Tank to be less than the required 145 feet from the new property line. This resulted in the Water Tank being a non-conforming structure in relation to height limits.

Site Development Proposal

Verizon Wireless is applying for a CMPT, a SPEX and a ZMOD to add a pod extension to the top of the existing 145ft Water Tank, increasing the Water Tank's height by approximately 8 ft and attaching to the pod a twelve (12) panel antenna array. The top of the antenna would be 155 ft above ground. Additionally there will be an unmanned equipment building measuring 12' x 30' x 10' at the base of the structure. This structure will occupy an area of 360 square feet.

The extension pod will be built to manufacturer standards and will comply with the wind load requirements and all other construction standards of Loudoun County. The antenna will have the following dimensions: six (6) panels measure 47.4" x 4.1" x 5.9" (L x W x D) and six (6) panels measure 94.5" x 5.5" x 13.2". The frequency range is 1850-1990 MHz and 806-960 MHz respectively.

There will be no customers at the site. An employee of Verizon will visit the site once every other month to ensure proper operation, unless repairs are needed. The unmanned equipment building is monitored off-site 24 hours a day, 7 days a week with a remote security system.



Verizon's proposal will be compatible with the existing Water Tank with regards to color, materials and design. The cable connecting to the unmanned equipment building will be carried through the interior access tube of the Water Tank. The compound is already landscaped to minimize the visual impact of the facility on surrounding properties.

Search for Alternative Sites

Verizon made a diligent search for alternative locations for the telecommunication facility in the vicinity of Round Hill and found this location to be the best possible site. The other alternatives were not acceptable because they either did not have an existing structure with the height necessary for signal propagation or would require the construction of a new tower or monopole. The Verizon proposal makes use of an existing structure as directed by the Comprehensive Plan.

The selected site has the following advantages:

- The proposed location will meet the service area requirements (see propagation maps included with application) with a minimum increase in height of an existing structure so that the telecommunication facility has minimal impact on adjacent properties.
- Based on the existing structure and the proposed extension, this site will provide a sufficient above-ground elevation for the necessary level of service within this search area.
- The proposed site will be surrounded at the base with landscaped areas in order to reduce the visual impact of the unmanned equipment structure at the base.
- The site is part of the network of Verizon Wireless Cell Sites in the Route 7 corridor and must be located in a fashion to work within the existing network of sites to eliminate an existing gap in cellular coverage.

No Anticipated Impact on Adjoining Communities and Properties

Once the installation is completed the only traffic to the site will be for routine maintenance, which by past experience has amounted to one visit every other month, or for emergency repair. There will be no offensive odors or harmful emissions from the equipment, or antenna. There will be no material adverse impact to the use and development of the surrounding properties. The size, scale and density of the proposal does not adversely impact the character of the area. The antenna and equipment structure have been designed so that the visual impacts are to the minimal extent necessary. The approximately eight (8) foot pod mount at the top of the Water Tank which will hold the proposed antenna will be sturdy enough to hold one (1) other provider should the County approve another user. The pod mount will be designed to be extended to the height requested by the new provider and approved by Loudoun County up to no more than twenty-five (25') above the Water Tank. Any providers beyond two (2) could not

run their cable(s) down the interior access tube but would have to run cable outside of the Water Tank down its side. Agreement by the Town of Round Hill for additional users would also be necessary.

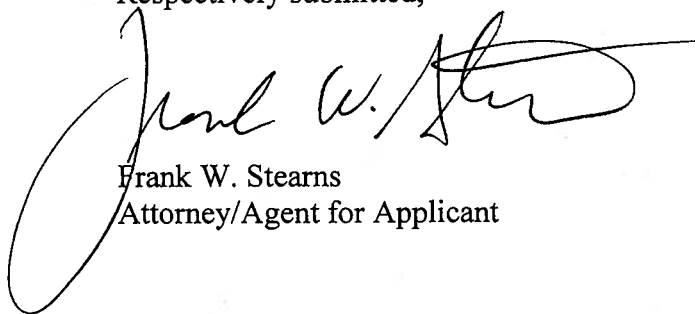
Conclusion

Verizon has located the proposed telecommunication facility in a manner compatible with the guidelines established by Loudoun County to provide reliable, quality service to Verizon's subscribers and eliminate a gap in service. Verizon proposes this new site with design criteria that will mitigate negative impacts on surrounding uses and the community.

This proposal is in substantial compliance with the applicable standards for location, character and extent for telecommunication facilities within Loudoun County. Verizon therefore requests approval of the CMPT, SPEX and ZMOD for this site.

If you have any questions or need further information, please do not hesitate to contact me at (703) 760-1956 or fwstearns@venable.com.

Respectively submitted,



Frank W. Stearns
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